

WALLACE
& NORDAN LLP
ATTORNEYS AT LAW

3737 GLENWOOD AVENUE, SUITE 260
RALEIGH, NORTH CAROLINA 27612

FEDERAL ELECTION COMMISSION
2012 AUG -6 PM 12:44
OFFICE OF THE CLERK
COUNCIL
JOHN R. WALLACE
RICHARD P. NORDAN
STEPH A. NEWSOME

July 31, 2012

Jeff S. Jordan
Supervisory Attorney
Complaints Examination and Legal Administration
Federal Election Commission
Washington, D.C. 20463

Re: MUR 6599

Dear Mr. Jordan:

We are in receipt of the letter from Scott Laster, Complainant and Executive Director of the North Carolina Republican Party.

I apologize for our delay in response. We had earlier received a similar Complaint and had responded; however, that response was directed to the North Carolina State Board of Elections.

Mr. Laster's Complaint alleges that in the 2012 First Quarter Report filed by the North Carolina Democratic Party, the Party paid funds from its non-federal account to Ms. Krista Anderson of Raleigh, North Carolina. The suggestion is that this payment from a non-federal account was made to a person employed by an entity engaged in federal activities.

Mr. Laster has attached a page from the non-federal report filed with the State Board of Elections, which does indeed identify Ms. Anderson as Operations Director for Organizing for America. Please be advised that Ms. Anderson was employed by the North Carolina Democratic Party in connection with non-federal matters at the beginning of 2012 (and in prior years), and she was paid for those activities from the non-federal account of the party. Thereafter, she became employed in her current position as Operations Director, where she is engaged in federal activities. For all of the duties that she has performed in that position, she has been paid from the federal account of the Party.

Ms. Anderson was identified as Operations Director in the non-federal report to the State Board of Elections referred to by Mr. Laster, because that report was created after her vendor record in the Party's database had been modified to reflect her new capacity. That is, she was Senate Caucus Director at the beginning of the year and had previously been identified on reports of the non-federal account of the Party as such, but in the reporting of the payments made

14044353704

J. Jordan
July 31, 2012
Page 2

in the First Quarter of 2012, the Party used her current identity as a vendor, which identity reflects her current employment as Operations Director. An examination of the federal report of the Party, copies of which is enclosed, demonstrates that Ms. Anderson has been paid from the federal account for her federal role. Please see the attached pages for the Party's federal reports filed on or about the 20th of both March and April.

Please let me know if you have any further questions regarding this matter.

Sincerely,

WALLACE & NORDAN, LLP

John R. Wallace

JRW/coo
Enclosures

14044353705

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 64 OF 122

<input type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25	<input type="checkbox"/> 26
<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input checked="" type="checkbox"/> 30b

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in full)

North Carolina Democratic Party - Federal

Full Name (Last, First, Middle Initial)

A. Gregory Jackson

Date of Disbursement

02	15	2012
----	----	------

Mailing Address 4900 Bana Dr. APT. 11 G

City	State	Zip Code
Raleigh	NC	27608

Purpose of Disbursement
Payroll

Candidate Name

Category/
Type

Transaction ID : 30b-34-00295-00702

Amount of Each Disbursement this Period

2381.43

[MEMO ITEM]

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Full Name (Last, First, Middle Initial)

B. Clifford Davy

Date of Disbursement

02	15	2012
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Mailing Address 246 Regimental Drive

City	State	Zip Code
Cameron	NC	28326

Purpose of Disbursement
Payroll

Candidate Name

Category/
Type

Transaction ID : 30b-34-00295-00700

Amount of Each Disbursement this Period

1519.58

[MEMO ITEM]

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Full Name (Last, First, Middle Initial)

C. Krista Anderson

Date of Disbursement

02	15	2012
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Mailing Address 1052 Mills St.

City	State	Zip Code
Raleigh	NC	27608

Purpose of Disbursement
Payroll

Candidate Name

Category/
Type

Transaction ID : 30b-34-00295-00715

Amount of Each Disbursement this Period

1529.92

[MEMO ITEM]

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

SUBTOTAL of Disbursements This Page (optional).....▶

0.00

TOTAL This Period (last page this line number only).....▶

**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
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Detailed Summary PageFOR LINE NUMBER:
(check only one)

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NAME OF COMMITTEE (In Full)

North Carolina Democratic Party - Federal

Full Name (Last, First, Middle Initial)

A. Anthony Nagatani

Date of Disbursement

02	29	2012
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Mailing Address 11771 Texas Ave Apt 2

Transaction ID : 30b-34-00314-00773

City State Zip Code
Los Angeles CA 90025

Amount of Each Disbursement this Period

Purpose of Disbursement
Payroll

1340.03

Candidate Name

Category/
Type

[MEMO ITEM]

Office Sought: ☐ House
☐ Senate
☐ PresidentDisbursement For: ☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Full Name (Last, First, Middle Initial)

B. Krista Anderson

Date of Disbursement

02	29	2012
----	----	------

Mailing Address 1052 Mills St.

Transaction ID : 30b-34-00314-00787

City State Zip Code
Raleigh NC 27608

Amount of Each Disbursement this Period

Purpose of Disbursement
Payroll

2168.68

Candidate Name

Category/
Type

[MEMO ITEM]

Office Sought: ☐ House
☐ Senate
☐ PresidentDisbursement For: ☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

Full Name (Last, First, Middle Initial)

C. Greg Ross

Date of Disbursement

02	29	2012
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Mailing Address 145 Cherry Lane

Transaction ID : 30b-34-00314-00775

City State Zip Code
Burlington VT 05401

Amount of Each Disbursement this Period

Purpose of Disbursement
Payroll

1340.03

Candidate Name

Category/
Type

[MEMO ITEM]

Office Sought: ☐ House
☐ Senate
☐ PresidentDisbursement For: ☐ Primary ☐ General
☐ Other (specify) ▼

State: District:

SUBTOTAL of Disbursements This Page (optional).....▶

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TOTAL This Period (last page this line number only).....▶

**SCHEDULE B (FEC Form 3X)
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NAME OF COMMITTEE (In Full)

North Carolina Democratic Party - Federal

Full Name (Last, First, Middle Initial)

A. ADP

Date of Disbursement

03	12	2012
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Mailing Address PO Box 9001008

Transaction ID : 30b-34-00395-0000

City	State	Zip Code
Louisville	KY	40290

Amount of Each Disbursement this Period

Purpose of Disbursement
See Memo EntriesCategory/
Type

72854.65

Candidate Name

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Full Name (Last, First, Middle Initial)

B. Krista Anderson

Date of Disbursement

03	12	2012
----	----	------

Mailing Address 1052 Mills St.

Transaction ID : 30b-34-00395-00816

City	State	Zip Code
Raleigh	NC	27608

Amount of Each Disbursement this Period

Purpose of Disbursement
PayrollCategory/
Type

2166.68

Candidate Name

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Full Name (Last, First, Middle Initial)

C. Ellen L Locke

Date of Disbursement

03	12	2012
----	----	------

Mailing Address 5309 Tallowtree Drive

Transaction ID : 30b-34-00395-00825

City	State	Zip Code
Raleigh	NC	27613

Amount of Each Disbursement this Period

Purpose of Disbursement
PayrollCategory/
Type

1111.87

Candidate Name

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) ▼

State:

District:

SUBTOTAL of Disbursements This Page (optional).....▶

72854.65

TOTAL This Period (last page this line number only).....▶

**SCHEDULE B (FEC Form 3X)
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(check only one)

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NAME OF COMMITTEE (In Full)

North Carolina Democratic Party - Federal

Full Name (Last, First, Middle Initial)

A. Krista Anderson

Date of Disbursement

MM	DD	YYYY
03	30	2012

Mailing Address 1052 Mills St.

Transaction ID : 30b-34-00438-01019

City	State	Zip Code
Raleigh	NC	27608

Amount of Each Disbursement this Period

Purpose of Disbursement
PayrollCategory/
Type

2166.68

Candidate Name

[MEMO ITEM]

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Full Name (Last, First, Middle Initial)

B. Garrison McMurtrey

Date of Disbursement

MM	DD	YYYY
03	30	2012

Mailing Address 346 East Dinkins Street

Transaction ID : 30b-34-00438-01018

City	State	Zip Code
Canton	MS	39046

Amount of Each Disbursement this Period

Purpose of Disbursement
PayrollCategory/
Type

1293.43

Candidate Name

[MEMO ITEM]

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) ▼

State:

District:

Full Name (Last, First, Middle Initial)

C. Punya Krishnappa

Date of Disbursement

MM	DD	YYYY
03	30	2012

Mailing Address 275 Aberdeen Drive

Transaction ID : 30b-34-00438-01017

City	State	Zip Code
Algonquin	IL	60102

Amount of Each Disbursement this Period

Purpose of Disbursement
PayrollCategory/
Type

1340.02

Candidate Name

[MEMO ITEM]

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For:

☐ Primary ☐ General
☐ Other (specify) ▼

State:

District:

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